

in New York in 1969, previously worked as a litigator for Children’s Rights and the American Civil Liberties Union, and has over 50 years of experience litigating civil rights and child-welfare reform cases in jurisdictions across the country. From my knowledge and understanding of the market in the Southern District of Mississippi, I believe that a rate of \$475 per hour does not exceed the market range of rates charged to fee-paying clients by lawyers of reasonably comparable skill, reputation, and experience.

4. ***Anastasia Benedetto and Jonathan Borle.*** I have also been informed of the following credentials and experience of Ms. Lowry’s associate counsel at A Better Childhood, Anastasia Benedetto and Jonathan Borle. Ms. Benedetto is a graduate of Benjamin N. Cardozo School of Law, was admitted to practice law in New York in 2018, and has four years of litigation experience, most of it as an attorney for A Better Childhood. Mr. Borle is a graduate of the University of Virginia School of Law, was admitted to practice law in California in 2017, and has over four years of litigation experience—including six months working as an attorney for A Better Childhood. It is my opinion that a rate of \$250 per hour for Mr. Borle and \$225 per hour for Ms. Benedetto does not exceed the rates charged to fee-paying clients for lawyers based in the Southern District of Mississippi of reasonably comparable skill, reputation, and experience.

5. ***Wayne Drinkwater.*** I am very familiar with local counsel for the plaintiffs’ class, Wayne Drinkwater, and his law firm, Bradley Arant Boult Cummings LLP. After completing law school, Mr. Drinkwater was admitted to practice law in Mississippi in 1974 and, before entering private practice, he served as a law clerk for Chief Judge William C. Keady of the United States District Court for the Northern District of Mississippi and for Chief Justice Warren E. Burger of the United States Supreme Court. Since 1977, Mr. Drinkwater has engaged in private practice in Mississippi, earning the reputation as one of the most highly respected and skilled litigators in Mississippi. Over the course of his 45-year career, it is my understanding

that Mr. Drinkwater has been sought out by clients to handle some of the most complex and high-profile litigation in our state. It is my opinion that a rate of \$450 per hour for Mr. Drinkwater does not exceed the range of market rates charged to fee-paying clients by lawyers based in the Southern District of Mississippi of reasonably comparable skill, reputation, and experience.

6. ***Michael Bentley.*** I am also familiar with Michael Bentley, who is Mr. Drinkwater's co-counsel and a partner at the firm of Bradley Arant Boult Cummings LLP. Mr. Bentley was admitted to practice law in Mississippi in 2007 and, before entering private practice, he served as a law clerk for Judge Leslie Southwick of the United States Court of Appeals for the Fifth Circuit. Since 2008, Mr. Bentley has been engaged in private practice as a general and commercial litigator at the Bradley firm. It is my opinion that a rate of \$325 per hour for Mr. Bentley does not exceed the range of market rates charged to fee-paying clients by lawyers based in the Southern District of Mississippi of reasonably comparable skill, reputation, and experience.

7. This class action litigation would be difficult for many firms and attorneys to sustain, as the attorneys are not paid on an ongoing basis as work is performed, are required to advance case expenses with no ongoing reimbursement, and are paid for their time and expenses only if they prevail in the case. I declare under the penalty of perjury that the foregoing information is true and correct to the best of my knowledge and understanding.

EXECUTED on this the 30th day of November, 2021.

s/ Robert Bruce McDuff

Robert Bruce McDuff